

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X		
<b>BEVERLEY BROWN,</b>	:	<b>ECF</b>
	:	
<b>Plaintiff,</b>	:	<b>07 CV 3291(KPC)</b>
	:	
<b>- against -</b>	:	
	:	<b>DISCLOSURES PURSUANT</b>
<b>JPMORGAN CHASE,</b>	:	<b>TO RULE 26(A) OF THE</b>
	:	<b>FEDERAL RULES OF</b>
<b>Defendant.</b>	:	<b><u>CIVIL PROCEDURE</u></b>
-----X		

JPMorgan Chase Bank, National Association (hereafter “Defendant” or “JPMC”), erroneously named herein as JP Morgan Chase, by its attorneys, the JPMorgan Chase Legal Department, respectfully submit its initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) as follows:

A. The names and, if known and presently available, the address and telephone numbers for individuals likely to have discoverable information relevant to the facts alleged in Plaintiff’s Complaint are: Cindy Davis, Penny McClung, Una Miller, Sherrie Rutter, Dennis Young. These individuals may be contacted via Tara A. Griffin, Assistant General Counsel, JPMorgan Chase Legal Department, One Chase Manhattan Plaza/26<sup>th</sup> Floor, New York, New York 10081; (212-552-5101).

B. Documents, data compilations, and tangible things that are relevant to disputed facts alleged with particularity in the pleadings include:

1. Employee records and profile forms for Plaintiff, Sherrie Rutter, Richard Albert, Charles Mazzearella;
2. Files maintained or obtained by JPMC’s Human Resources Department concerning Plaintiff, Sherrie Rutter, Richard Albert, Charles Mazzearella;

3. Available manager records for Plaintiff, Sherrie Rutter, Richard Albert, Charles Mazzarella;
4. Business organizational charts;
5. Relevant correspondents including, without limitation, electronic mail correspondence;
6. Relevant Reduction in Force Business Plan;
7. JPMC Corporate Human Resource Policies; and
8. JPMC Code of Conduct.

Copies of the documents referred to above will be provided to Plaintiff upon Defendant's receipt of a Stipulation and Order of Confidentiality which has been executed by Plaintiff and his attorneys and "So Ordered" by the Court. In the meantime, such documents are available for inspection, by appointment, at the offices of the JPMorgan Chase Legal Department, One Chase Manhattan Plaza, 26<sup>th</sup> Floor, New York, New York 10081, Attn: Tara A. Griffin, (212) 552-5101.

C. The provisions of Federal Rule of Civil Procedure 26(a)(1)(C) are not applicable at this time because Defendant currently is not seeking damages from Plaintiff.

D. Defendant is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement their response as appropriate.

Dated: New York, New York  
August 30, 2007

**JPMORGAN CHASE LEGAL DEPARTMENT**

By:   
**TARA A. GRIFFIN, ESQ. (TAG 9462)**

Attorneys for Defendant  
One Chase Manhattan Plaza, 26th Floor  
New York, New York 10081  
(212) 552-5101

To: Ambrose W. Wotorson (AWW-2412)  
Law Office of Ambrose Wotorson, P.C.  
26 Court Street, Suite 1811  
Brooklyn, New York 11242  
(718) 797-4861

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ECF  
07 CV 3291 (KPC)

**AFFIDAVIT OF  
SERVICE**

STATE OF NEW YORK )

) ss.:

COUNTY OF NEW YORK )

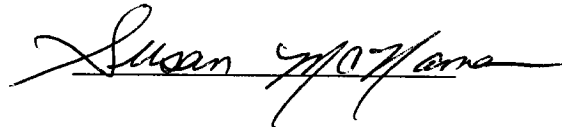
SUSAN McNAMARA, being duly sworn, deposes and says, that deponent is not a party to the action, is over eighteen years of age and is employed by JPMorgan Chase Bank, N.A.

That on the 30<sup>th</sup> day of August 2007, deponent served the within by mail:

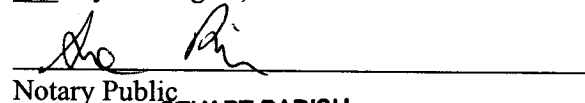
DISCLOSURES PURSUANT TO RULE 26(A) OF THE FEDERAL RULES  
OF CIVIL PROCEDURE

TO: Ambrose W. Wotorson , Esq.  
Law Office of Ambrose Wotorson, P.C.  
26 Court Street, Suite 811  
Brooklyn, New York 11242  
(718) 697-4861

by the address designated for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.



Sworn to before me this  
30<sup>th</sup> day of August, 2007

  
\_\_\_\_\_  
Notary Public

STUART RADISH  
Notary Public, State of New York  
No. 01RA6115435  
Qualified in New York County  
Commission Expires September 7, 2008